

Attachment 1



September 13, 2002
2003 Release Schedule Meeting
MEETING MINUTES

MEETING NAME	MINUTES PREPARED BY:	DATE PREPARED
2003 Release Schedule Meeting	Steve Hancock – Change Management Team	09/19/02

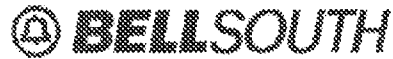
Participants/Attendees

PARTICIPANT	COMPANY	PARTICIPANT	COMPANY
Steve Hancock	BST - CCP	Mel Wagner	Birch
Valerie Cottingham	BST - CCP	Stacey Hassan	Birch
Jill Williamson	BST - CCP	Bob Carias	Nightfire
Dennis Davis	BST - CCP	Hollis Carlson	Seven Bridges Comm.
Bernadette Seigler	AT&T	Suzie Lavett	BST - Project/Product Management
Bill Grant	Telcordia	Tyra Hush	WorldCom
Tami Swenson	Accenture	Rick Whisamore	WorldCom
Mary Conquest	ITC Deltacom	Heather Thompson	Allegiance
Louis Davido	Dset	Jeremy Bata	Access Integrated
Bob Bourasse	Allegiance Telecom	Sherry Litchenberg	WorldCom
Chris Iacovelli	AT&T	Cindy Schneider	Concretio
John Duffey	FL PSC	Colette Davis	Covad
Brenda Slonneger	BST - ELMS6 Proj Mgr		

Meeting Information History

DATE	START TIME	END TIME
9/13/02	10:00 AM ET	Noon
Conf Bridge		

MEETING PURPOSE
<ul style="list-style-type: none">Review BellSouth's proposed 2003 Release Schedule



September 13, 2002
2003 Release Schedule Meeting
MEETING MINUTES

MEETING MINUTES

Agenda Items	Discussion
1. Introductions/Welcome	Steve Hancock (BST-Change Management Team) welcomed everyone and stated that the purpose of this call was to discuss the following: <ul style="list-style-type: none">• Review BellSouth's proposed 2003 Release Schedule

September 13, 2002
2003 Release Schedule Meeting
MEETING MINUTES

Agenda Items	Discussion
<p>2. Overview of BellSouth's Proposed 2003 Release Schedule</p>	<p>Jill Williamson (BST) stated that two (2) documents have been provided to the CLECs: 2003 Release Schedule Proposal and the List of Prioritized Change Requests. The CLEC option submitted to Change Control is referred to as Option 1 on the proposal. Option 2 will reflect BellSouth's option of maintaining Releases 12.0, 13.0, & 14.0 in 2003 and moving ELMS6 into 2004. BellSouth has attempted to give a potential scope for both Options. Jill explained that whichever option is chosen, BellSouth will prepare a finalized scope and schedule and distribute back to the CLECs within 2 weeks from the time an option is selected by the CLECs.</p> <p>Sherry Lichtenberg (WorldCom) acknowledged appreciation for the work effort that BST had put into the preparation of the 2003 Release Options. She asked if BST will make a joint decision with the CLECs' input and if BST will be asking the CLECs to vote on which option package they desire. She also pointed out that since the GA PSC has made its recommendation, BST should ensure that it will not be changing the prioritization order of any previously prioritized requests. Jill Williamson stated that BST would not be changing the prioritization order and that BST will meet with the CLECs to discuss the final recommendation.</p> <p>Jill addressed the estimated capacity in each option listed in the Release Schedule Proposal. She pointed out that Release 12.0 is firm, the units will remain the same at 182. This will include Interactive Agent/Firm Order, four (4) Flow Through features, and CR0652 - Translate and Parse data for the following information on CSR (TOA, BRO, STYC, DGOUT, TOS and LNPL). Jill also pointed out that with the estimates for Option 1, Release 13.0 will contain 600 units with an implementation date of 06/08/03.</p> <p>Jill explained that there will be a NANC 3.2 (LNP Industry Release) in May, 2003. The LNP Industry Forum will dictate BellSouth's implementation dates for this release. Jill stated that the NANC Release in 2001 required approximately 99 units of capacity but pointed out that this release will require a large LNP resource capacity and the complexity of this release should be defined in November, 2002. The tentative dates for the 2003 NANC Release will be May, 2003. Sherry Lichtenberg (WorldCom) asked if this NANC Industry Release will be correcting the current NPAC problems. Jill stated that this Industry Release was not related to any NPAC problems.</p> <p>Tyra Hush (WorldCom) asked if BST would be implementing all of CR0443 - Billing Completion Notifier. Jill explained that BST would be implementing Phase I at this time.</p> <p>Sherry Lichtenberg (WorldCom) asked what will happen if BST cannot do Phase I of CR0443 in Option 1. Sherry also pointed out that if BST cannot get this work request implemented, the CLECs will be forced to go to a commission to get an order. Jill acknowledged the CLECs' concerns.</p>

September 13, 2002

2003 Release Schedule Meeting

MEETING MINUTES

Agenda Items	Discussion
	<p>Sherry Lichtenberg asked why CR0284 (#5) is not currently in Option 1 or Option 2? Jill explained that this request involves a large LNP work effort and given the NANC 3.2 release in May, 2003, the capacity for LNP work in the 12.0 and 13.0 release timeframes is significantly limited.</p> <p>Bernadette Seigler (AT&T) expressed her concerns that caveats are being placed around several change requests. Bill Grant (Telcordia) asked if BST could use any of the 210 Reserve units in another release, possibly 15.0. Jill stated that BST would investigate this. Bernadette Seigler (AT&T) asked if the 210 Reserve units was equivalent to 10% of release capacity that BST had previously stated it would put in reserve capacity. Jill explained that BST placed as much capacity into the Release as possible.</p> <p>Bernadette Seigler (AT&T) asked if BST has published the CAVE windows associated with the 2003 Release Proposal. Jill explained that the CAVE windows in 2003 will be as follows:</p> <p>Option 1:</p> <ul style="list-style-type: none"> • Release 12.0 - Pre-1/27 - 3/28/03, Post-3/30 - 5/29/03 • Release 13.0 - Pre-4/8 - 6/6/03, Post-6/8 - 8/8/03 • Release 15.0 (ELMS6) - Pre-9/22 - 12/11/03 <p>Option 2:</p> <ul style="list-style-type: none"> • Release 12.0 - Pre-1/27 - 3/28/03, Post - 3/30 - 5/29/03 • Release 13.0 - Pre-4/8 - 6/6/03, Post - 6/8 - 8/8/03 • Release 14.0 - Pre-7/24 - 9/25/03, Post-9/28 - 11/26/03

September 13, 2002
2003 Release Schedule Meeting
MEETING MINUTES

Agenda Items	Discussion
	<p>Jill Williamson pointed out that although in Option 2, ELMS6 is proposed for Release 15.0 in 2004, the majority of the work effort will be done in 2003. Sherry Lichtenberg (WorldCom) asked why ELMS6 would not be implemented until April, 2004? Jill further explained that this is due to the fact that Release 14.0 still remained in the Option 2 proposal.</p> <p>Sherry Lichtenberg asked BST to confirm that in order for #4 ranked change request (CR0443), to get into Release 13.0, BST had to push ELMS6 out a year. She also questioned why it appeared that BST was concentrating on implementing the majority of requests except CR0443.</p> <p>Jill explained that it is BST's goal to implement all of the prioritized requests in priority order as capacity, timeframes and other factors allow; however, BellSouth initially concentrated on the top two requests, which are both very large, soon after the 5/22/02 prioritization meeting. The efforts around CR0443 have been ongoing, however the impact was not finalized by all applications until recently.</p> <p>Bob Carias (Nightfire) asked if wireless LNP was still in BST's plans for 2003. Jill stated that it was; however, it would not take away any resources from the CCP 2003 Release capacity.</p> <p>Valerie Cottingham (BST) pointed out that the Summary of candidate requests reflected CR0621 in Release 14.0. This is a typo and should reflect Release 11.0, as it is currently scheduled.</p> <p>Bernadette Seigler (AT&T) questioned the sizing estimate for CR0621. Jill stated that she did not have this information but will provide it.</p>
ACTION ITEM: BellSouth to provide sizing estimate for CR0621. (17.67 units)	

September 13, 2002
2003 Release Schedule Meeting
MEETING MINUTES

Agenda Items	Discussion
	<p>Bernadette Seigler (AT&T) asked when BST will be able to schedule the remaining Flow Through Task Force items. Jill explained that she currently does not have the details; however, this will be discussed during the next FTTF meeting scheduled in Oct, 2002.</p> <p>Bernadette Seigler (AT&T) stated that the CLECs had submitted concerns in their recent proposal regarding the need for BST to push TAG & XML version retirements out to Dec., 2002. Jill Williamson asked for clarification on AT&T's request, which asks for a 90 day extension of the TAG version retirements currently scheduled for May, but also for the retirements not be retired before December, 2003. Bernadette and Bill Grant (Telcordia) explained that the CLECs want to ensure that a 90-day window is given.</p> <p>Jill Williamson explained that BST will agree to allow the 90-day window for retirement of these versions. Sherry Lichtenberg (WorldCom) asked that BST document this with its final proposal.</p> <p>Bill Grant (Telcordia) asked when BST will be making its infrastructure changes. Jill explained that the majority of infrastructure changes will be done with ELMS6 and details will be provided at a later date.</p> <p>Valerie Cottingham (BST) stated that BST will submit a ballot to the CLECs on Monday, 9/16, asking for them to choose which option they prefer BellSouth to proceed with. The CLEC response will be due by COB, Wednesday, 9/18.</p>
5. Summary of New Action Items	
	<p>NEW ACTION ITEM: BellSouth to provide sizing estimate for CR0621. (17.67 units)</p>

Attachment 2



July 19, 2002
Release 12.0 Package Meeting
MEETING MINUTES

MEETING NAME	MINUTES PREPARED BY:	DATE PREPARED
Release 12.0 Package Meeting (March 2003 Release)	Cheryl Storey – Change Management Team	7-22-02

Participants/Attendees

PARTICIPANT	COMPANY
Cheryl Storey	BST - CCP
Valerie Cottingham	BST - CCP
Audrey Thomas	BST
Peter Cole	AT&T
Kathy Rainwater	BST - CCP
Mike Young	Telcordia
Tami Swenson	Accenture
Dennis Davis	BST - CCP

PARTICIPANT	COMPANY
Nicole Kisling	Birch
Meena Masih	BST
Gary Jones	BST Flow Through
Rose Kirkland	BellSouth Technology
Tyra Hush	WorldCom
Dale Donaldson	Epb Telcom
Mel Wagner	Birch
Heather Thompson	Allegiance

Meeting Information History

DATE	START TIME	END TIME
7/19/02	1:30 PM ET	2:00 PM ET
Conf Bridge		

MEETING PURPOSE
<ul style="list-style-type: none">• Present & Discuss the Release 12.0 Package (March 2003 Release)• Review Action Items & Assign Owners

July 19, 2002
Release 12.0 Package Meeting
MEETING MINUTES

MEETING MINUTES

Agenda Items	Discussion
1. I n t r o d u c t i o n s / W e l c o m e	<p>Cheryl Storey (BST- Change Management Team) welcomed everyone and stated that the purpose of this call was to present and discuss the Release Package for the March 2003 Release. Two documents were distributed for review/discussion:</p> <ul style="list-style-type: none">• CCP Feature Release Implementation Schedule (PowerPoint)• 2003 Work Breakdown Schedule (Excel spreadsheets)

July 19, 2002

Release 12.0 Package Meeting
MEETING MINUTES

Agenda Items	Discussion
2. Release 12.0 Package	<p>Audrey Thomas (BST) provided the status of the Infrastructure upgrades. The Infrastructure changes will migrate the Encore platform to Integrated Digital Network (IDN). Audrey indicated that activities are currently underway, mainly the TAG XML conversion. The next step was to migrate some of the Products/Services from Encore to IDN. BST had planned to begin migrating these products with Release 12.0 in March 2003. Since additional information is needed from the planning and analysis phase before this migration can take place, the decision was made to delay this effort until a later date. Due to this delay, capacity has been freed up to work other requests in the March 2003 Release. BST will continue to keep the CLECs informed of updates with Infrastructure changes via CCP meetings.</p> <p>Meena Masih (BST) presented the Release 12.0 package. Release 12.0 is a BST Production Release and is scheduled for implementation 3/29/03 - 3/30/03. The change requests that are targeted for Release 12.0 include:</p> <ul style="list-style-type: none">• CR0186 - Interactive Agent• CR0101 - EDI Pre-Order• CR0495 - Correct Ringmaster RNP (FTTF)• CR0496 - Multi-Feature Discount (FTTF)• CR0729 - 4-Wire Digital

July 19, 2002**Release 12.0 Package Meeting
MEETING MINUTES**

Agenda Items	Discussion
	<p>Tyra questioned why "targeted" was listed on the flagship by each change request for Release 12.0. Meena replied that BellSouth is still in the analysis phase and determining if supporting infrastructure changes will be needed for some of the change requests. The intention is to deliver the change requests listed on the flagship for Release 12.0.</p> <p>Tyra also questioned how this impacts the planned TAG Infrastructure changes. BST replied there are no dependencies.</p> <p>Audrey stated that for Interactive Agent, meetings with the CLEC community will be scheduled to better understand the requirements. Since the OBF technical meeting for Interactive Agent is no longer in existence, BellSouth needs additional information on what standards Interactive Agent should be built. The deadline for understanding the IA requirements is by 9/30/02. A CLEC meeting will be scheduled by no later than 8/14/02 (possibly the next EDI User's Group meeting). BellSouth will submit questions in advance to the CLEC community prior to the meeting. See Action Items.</p>

July 19, 2002**Release 12.0 Package Meeting
MEETING MINUTES**

Agenda Items	Discussion
3. 2003 Work Breakdown Schedule	<p>Meena reviewed the 2003 Work Breakdown Schedule. A revised copy will be provided to the CLECs later today to reflect minor corrections (change in years, '02' to '03'). See Action Items.</p> <p>It was questioned if ELMS 6 was on target. Meena replied 'yes'.</p> <p>Mel questioned when the other 2003 release dates would be added to the flagship. Meena replied that as a release scope is presented, it would be added to the flagship document.</p> <p>Mel also questioned the dates for the maintenance releases. Meena indicated that as the actual dates are confirmed, they would be added to the flagship. The months for the maintenance releases are firm.</p>
4. Summary of New Action Items	
	<p>NEW ACTION ITEM: BellSouth to schedule a meeting with the CLECs to better understand the requirements for Interactive Agent. BellSouth will submit questions in advance to the CLEC community prior to the meeting.</p>



July 19, 2002

Release 12.0 Package Meeting
MEETING MINUTES

Agenda Items	Discussion
	<p>NEW ACTION ITEM: BellSouth to distribute a revised copy of the 2003 Work Breakdown Schedule that reflects minor corrections (change in years, '02' to '03).</p> <p>Status: Revised 2003 WBS distributed 7-19-02.</p>

Attachment 3

October 4, 2002
FTTF Conference Call

Time: 2:00 – 3:30 EST.

Conference Bridge: 205 968-9300 Access Code – 911022.

Opening and Introductions..... <i>Facilitator/BellSouth opens meeting.</i>	2:00 – 2:15
Status of FT Items	2:15 – 2:45
Open Discussion.....	2:45 – 3:15
Action Items/Adjourn..... <i>Facilitator/BellSouth reviews next steps</i>	3:15 – 3:30

Flow Through Task Force
Implemented Items

FTTF#	CR#	Description Of Request	Detailed Description	Release
FTTF-01	0557	Mechanization of UDC Loops	Allow electronic ordering of UDC-Universal Digital Channel) Loop for ReqType A, ACT N & D. Also add RCO tables for ACT of D, C, T, & W. Add LNA tables for D, C, & W	Phase 1 (Manual to Planned Manual Fall Out)10.3.1 Phase II Planned Manual Fall Out to Flow-Through in 10.5
FTTF-04	0724	UNE-P w/SPP	Strip SPP at time of conversion/migration to UNE-P	10.5
FTTF-12		Mechanization of UNE T-1		Tested LSR submitted, HCE-mechanized DS1 **CLECs providing samples of LSRs-some items are already electronic
FTTF-14	0441	Line Splitting	Allow the capability to order Line Splitting electronically	10.3
FTTF-15	0078	EELS/Non-Switched Combo	Add the capability to order UNE extended loops (EELS) via the current EDI interface. For new EELS and migration of existing Access circuits to UNE EELS	10.5
FTTF-17	0137	Partial Migrations Of Req CB, Act P & Q	Fully mechanize ReqType CB, ACTs P & Q for LNP orders.	10.4
FTTF-24	0494	Mechanize Q-Status LSRs	When a sup is received on a previously clarified LSR and a pending order cannot be found or is in CA status, the electronic systems EDI, LENS, TAG should generate a new service order	10.5
FTTF-26	0365	Mechanize TN change-Make ADL MNTN	Allow single order processing of a main telephone number change on a Req J. Utilize EATN for existing account number and ATN for new account number	10.5
FTTF-27	0493	Removal of ADSL on Conversions	Modify Req M ADSL and USOC SFWE+ by stripping the restricted USOCs from CSR when migrating an account with ADSL, Zone Mileage, and/or BellSouth.Net are reflected on CSR	Canceled
FTTF-29	0490	Correct CCON format on UNE-P	LESOG should properly format CCON on UNE-P and Resale conversions. ReqTypes E&M, ACTs V, W, P, Q, C LNA C, N, V, D	10.2

Flow Through Task Force
Implemented Items

FTTF#	CR#	Description Of Request	Detailed Description	Release
FTTF-30	0491	Removal of RTX	RTX is no longer a required field on service orders	9.2.1

Flow Through Task Force
Scheduled Items

FTTF#	CR#	Description Of Request	Detailed Description	Targeted Release
FTTF-05	0725	Denials/Restorals on Converted/Disconnected Accounts	When issuing conversion order and account is denied , process conversion and restore service	10.6
FTTF-18	0160	Partial Migrations of Req BB, Act P & Q	Fully mechanize ReqType BB, ACTs P & Q for loop with LNP orders.	10.6
FTTF-25	0492	Coin Mechanziation	Enhance LENS, TAG, EDI to process coin orders (ReqType M)	11.0
FTTF-32	0228	Req E & M, Act of T	Mech Removal of DSL with UNE-P conversions, LNA=V	11.0
FTTF-11	0541	Mechanization of UCL-Non Designed	Allow the electronic ordering of UCL-ND Loops	Manual to Electronic 10.6 Complete Mechanization in 11.0
FTTF-13	0029	Partial Migrations Of UNE Loops (Req A)	Provide the functionality to submit partial migrations for Req A UNE Loops manually and electronically. TCIF 9.	Manual to Electronic 10.6 Complete Mechanization in 11.0 (XDSL will fall for manual handling until release 11.0)
FTTF-34	0625	Mech Removal of DSL with UNE-P conversions, LNA=V	Drop DSL USOC (ADL11 USOC) upon conversion without receiving auto-clarification. On UNE-P ACT V, LNA V-Drop USOC. Maintain auto-clarification on LNA of G.	11.0
FTTF-36	0621	ECCKT Not Returned on Mechanized or Manual Loop Orders for Line	The ECCKT is not being returned on mechanized or manual loop orders for Lineshare orders. BellSouth needs to provide the circuit information back through EDI as well as in the manual environment with the FOC and Completion Notice. .	11.0
FTTF-16	0729	4-Wire Loops	Ability to issue 4 Wire Loops electronically	LNP 11.0 Encore 12.0
FTTF-28	0496	Multi Feature Discount	When an invalid MFDP USOC is populated, the LSR should be auto clarified in states other than North Carolina and South Carolina	12.0
FTTF-31	0495	Correct Ringmaster RNP	The electronic system should generate a service order when an LSR is received requesting or changing the RNP fid.	12.0
FTTF-35	0674	MemoryCall Access #-LENS Viewable	Enable LENS to provide access number for Enhanced MemoryCall (EMSBX & EMSBF)	12.0
FTTF-19	0357 0088	Mechanization of Unbundled Network Terminating Wire (UNTW)	Provide the functionality to order UNTW through EDI	13.0

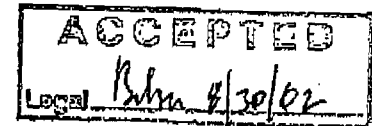
Flow-Through Task Force
Items

FTTF#	CR#	Description Of Request	Detailed Description	Targeted Release
FTTF-02	0241 0003	RPON'd LSRs	Establish business rules for RPON'd LSRs. Ensure a reject statement is added for RPONs to match manual processes	LSOG 6
FTTF-37	0688	Directory Listings Indentions and Captions	Ability to process Indention and Caption listings electronically	LSOG 6
FTTF-37	0688	LNP w/ Complex Listings	Ability to Issue LNP with Complex Listings electronically	LSOG 6
FTTF-21	0505	Electronic ordering of ISDN-PRI	To establish the electronic ordering of ISDN-PRI and to prepare the appropriate Business Rules	Accepted at OBF August 2002. Bellsouth SME working on Requirements and Business Rules for Electronic Systems
FTTF-23	0518	Electronic ordering of ISDN-BRI (UDN)	Develop electronic business rules for ISDN-BRI Resale ReqType E, ACTs C, D, V, W, P, & Q	Accepted at OBF August 2002. Bellsouth SME working on Requirements and Business Rules for Electronic Systems
FTTF-08	0728	LNP w/ Complex Services	Ability to Issue LNP with Complex Services electronically	To be implemented by individual services
FTTF-38	0866	EELS/Non-Switched Combo	Move from Electronic Process to completely Mechanized Process	After ELMS 6
FTTF-03	0335	Multi Line Hunting	To mechanize Multi-Line Hunting	
FTTF-06	0726	Complex DID	Enhance electronic systems to process more DID services	
FTTF-10	0563	XDSL via LENS, ACT T	Establish an ordering process in LENS for XDSL Req A, ACT T	Approximately 900 Month
FTTF-20	0273	Ability to order RCF (Remote Call Forwarding) via LENS	Allow LENS to process RCF requests	
FTTF-22	0506	Electronic ordering of Frame Relay	To establish electronic ordering of frame relay and prepare the appropriate business rules.	
FTTF-33	0622	Loop Modification-Pre Approval	Develop a process to pre-approve loops to reduce and improve loop delivery time	
FTTF-39	0946	Provide TN only Validation for Line Shared Loops	Use the TN to validate the adress on Line Shared Loops	New

Attachment 4



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August 29, 2002

The Honorable Gary E. Walsh
Executive Director
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: Application of BellSouth Telecommunications, Inc. to Provide In-Region
InterLATA Services Pursuant to Section 271 of the Telecommunications
Act of 1996
Docket No.: 2001-209-C

Dear Mr. Walsh:

In Order No. 2002-77 in the above-captioned docket, the Commission ordered as follows:

BellSouth shall include in the SQM appropriate metrics that measure and assess BellSouth's responsiveness to CLEC-initiated changes submitted to the Change Control Process ("CCP"), and BellSouth shall include at least one payment category under Tier 1 of the IPP for assessing the effectiveness of the CCP regarding CLECs.

BellSouth applauds this Commission for its foresight in recognizing the importance of the CCP in the overall 271 process. The FCC and other states have agreed, and the CCP has continued to evolve and improve. Since last summer's hearings in this docket the FCC found BellSouth's CCP compliant with Section 271 in its *Georgia/Louisiana Order*. Now to comply with this Commission's Order, BellSouth is taking several important steps with respect to measurements and penalties, each of which will be detailed in this filing. BellSouth has met with the Commission Staff to discuss these changes and to explain BellSouth's response to the Commission's order.

50/50 Prioritization Plan Has Been Implemented

BellSouth has continued to work collaboratively with CLECs on prioritization issues and to provide CLECs with sufficient information to be able to make informed

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decisions regarding prioritization of proposed system changes. *See Georgia/Louisiana Order ¶¶ 183, 193.* Recently, the Florida Public Service Commission ("Florida Commission") voted to implement BellSouth's so-called 50/50 prioritization proposal whereby BellSouth and the CLECs share equally in the release capacity. Prior to the Florida Commission's adoption of the proposal, KPMG commented favorably on it in its draft Final Report in the OSS Third Party Test. *See KPMG, BellSouth Telecommunications, Inc. OSS Evaluation Project, Draft Final Report, Version 1.0 (June 21, 2002).* To enable the CCP to effectively implement this prioritization plan, BellSouth now provides CLECs with release plans and change capacity information, both projected and historical. For example, thus far, BellSouth has provided CLECs with two proposed release plans for 2003, one plan with an industry release and one plan without such a release. The release plans set forth, in units, the capacity for each release. BellSouth then provided the CLECs with first quarter 2002 historical usage, and sizing information (also in units) for 40 out of 42 possible change requests eligible for prioritization (the remaining 2 could not be sized). The CLECs used this information to prioritize change requests. Once prioritized, BellSouth uses the prioritization to scope its releases - for example, BellSouth used the May 15, 2002 prioritization list to scope the first 2003 production release. BellSouth is scheduled to provide the scope for the second 2003 release on September 6, 2002.

The 50/50 prioritization plan, in and of itself, should provide the Commission with a high degree of comfort that BellSouth will continue to be responsive to CLEC-initiated change requests. The 50/50 plan will allocate one-half of BellSouth's IT release capacity to the CLEC community for the implementation of CLEC desired changes. The CLECs will prioritize CLEC and BellSouth change requests, (Type 4s and Type 5s) for their release according to their business needs. **BellSouth does not have input into this process.** BellSouth agrees, however, with the CLECs that the regulatory change requests (Type 2s) and defects (Type 6s) will be implemented ahead of CLEC-initiated change requests (Type 5s) and any Type 4 change requests that the CLECs elect to include in their production releases. If they so elect, the Type 4s will be prioritized with the Type 5s after the 2s and 6s.

BellSouth will use the remaining half of planned production release capacity. BellSouth will prioritize and implement its production release capacity according to its business needs. BellSouth will likewise implement Type 2 and Type 6 change requests ahead of Type 4 change requests. BellSouth may include CLEC-initiated change requests (Type 5's) in its production releases, but if it should choose to do so, Type 5's would be implemented after the Type 2's and Type 6's in accordance with the agreement between BellSouth and the CLECs.

BellSouth provides CLECs with the information they need to efficiently prioritize change requests. BellSouth provides CLECs with estimates of capacity for all Type 4

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and Type 5 change requests. This sizing information is a preliminary estimate of the work effort.¹ The CCP members provide this information to the CLECs as part of the change review meeting package that is distributed to all CCP participants five to seven business days before the meeting. The template for the form that the CCP participant completes for each Type 4 and Type 5 change request is located in Appendix H to the CCP document. In addition to the sizing information, BellSouth provides CLECs with a schedule of upcoming releases.

Importantly, BellSouth has continued to concentrate as much on adherence to the process as it has on process improvements. There is no question that BellSouth has continued to comply with the process, including the provision of documentation. See *Georgia/Louisiana Order ¶¶ 192-193 & 196, n.753*. By year-end 2002, BellSouth expects to have implemented 40 change requests for features, including the CLECs' Top 15 requests. In short, BellSouth is working with, and being responsive to CLECs.

BellSouth Has Voluntarily Implemented 6 New CCP Measures and 3 IPP Penalties

In conjunction with the evolution and growth of the process itself, and after extensive work by the Florida and Georgia Commissions, as well as this Commission, BellSouth has voluntarily implemented 6 new change control measures that it believes both comply with the spirit of the Commission's Order and provide more than sufficient information for regulators and CLECs to monitor BellSouth's on-going compliance with the CCP. Because the CCP is a regional process, BellSouth has voluntarily agreed to implement these measures in all nine states. The measures are as follows:

- CM-6: Percent of Software Errors Corrected in X (10, 30, 45) Business Days
- CM-7: Percent of Change Requests Accepted or Rejected Within 10 Days
- CM-8: Percent of Change Requests Rejected
- CM-9: Number of Defects in Production Releases (Type 6 CR)
- CM-10: Software Validation

¹ After prioritization, each interface is assessed in depth to determine the scope of the change request. Based on the assessment, an adjustment in the sizing may be required.

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- CM-11: Percent Of Change Request Implemented Within 60 Weeks of Prioritization²

Copies of the SQM pages and the relevant IPP addendum for these measures are attached to this letter as Exhibit A. In conjunction with these measures, BellSouth will voluntarily pay Tier 2 penalties on measures CM-6, CM-7 and CM-11.

When coupled with the previously approved 5 CCP measures, BellSouth will provide this Commission with data for 11 CCP measures, 5 of which have Tier 2 penalties attached to them. A list of all 11 CCP measures is attached hereto as Exhibit B. There is no question that these measures will allow the Commission to "assess BellSouth's responsiveness to CLEC-initiated changes submitted to the [CCP]," both in terms of acceptance and implementation, as well as monitor the quality of the releases BellSouth implements.

Tier 1 Penalty Is Not Appropriate

The Commission's Order on Reconsideration specified that BellSouth and the Commission staff should address whether a CCP penalty should be Tier 1 or Tier 2. The following will explain that Tier 1 penalties are neither appropriate nor necessary to accomplish the Commission's goals. First, the extensive nature of both the measurements and the penalties that BellSouth has put into place regarding CCP far exceed the scope of the measurements in place in November 2001 when the Commission issued its order. While the Commission may have believed a Tier 1 penalty was appropriate at that time, the risks inherent in a Tier 1 CCP penalty now far outweigh any perceived benefits. Moreover, as discussed above, both Florida and Georgia have had significant involvement in the evolution of the CCP measures and penalties and neither considered Tier 1 penalties; none of the other 6 states in which BellSouth has voluntarily implemented these measures or penalties suggested Tier 1 penalties either.

A Tier 1 penalty for a CCP measure is an invitation to the CLECs to game the measurement process and the CCP process. As the Commission is aware, a Tier 1 penalty is paid when a CLEC is harmed individually, i.e. when its service orders are not provisioned correctly or its orders are not submitted on time. The CCP, in stark contrast, is a collaborative process designed to benefit the industry as a whole, not individual CLECs. The CCP members jointly prioritize change requests, resolve issues and work to implement system changes for the good of the industry as a whole. Requiring a Tier 1 penalty, paid to individual CLECs, would create an incentive for the CLECs to manipulate the process for the individual good rather than the good of the entire CCP.

² Acceptance of change requests is subject to technical feasibility, cost, and industry standards.

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For example, a CLEC could submit a large number of meaningless requests in an attempt solely to receive payments for those rejected and not implemented.

Moreover, the Tier 2 penalties provided for in the attached measurements will provide BellSouth with an incentive, in addition to those incentives that already exist, to be responsive to CLEC-initiated change requests. There is no increased incentive achieved for addressing CLEC-initiated changes submitted to the CCP by assessing a Tier 1 penalty. In other words, the point of Tier 1 penalties is to pay on a CLEC-by-CLEC basis for independent harms caused to particular CLECs until such time as the harm becomes industry-wide at which point the Tier 2 penalties are appropriate. In the case of the CCP, an industry-wide process at the outset, there is no need for the incremental penalties – a failure in the process affects all members of the CCP (not just individual members) and thus it is appropriate to escalate immediately to Tier 2 penalties.

Finally, a Tier 1 penalty for CCP would be almost impossible to administer. Take, for example, a change request submitted by CLEC A. While CLEC A remains the originator of the request, once the request is accepted by the CCP, it goes into Pending status awaiting prioritization by the CLECs as a whole. While the change request may be a high priority for CLEC A, it may not be for the industry as a whole. Under this scenario, during the prioritization process, the request would be ranked very low and thus might not be implemented in 60 weeks. The low prioritization, however, is how the system works – it does not entitle CLEC A to an individual penalty simply because its request was deemed of lesser importance by the industry as a whole. In short, the IPP is designed to motivate BellSouth to continue to meet its obligations after receiving 271 approval in South Carolina – it is not designed to be a CLEC-enrichment plan. Therefore, BellSouth respectfully asks the Commission to accept the five Tier 2 penalties proposed by BellSouth in lieu of one Tier 1 penalty described in the Commission's Order.

Additional CCP Improvements Are Under Development

While the FCC found BellSouth's CCP compliant with Section 271 in its *Georgia/Louisiana Order*, BellSouth has not only continued to meet its obligations, but has met the FCC's challenge to continue to develop the process. For example, BellSouth has continued to provide a forum whereby BellSouth and CLECs can continue to discuss and implement improvements to the change control process. Since November 6, 2001, BellSouth has held 84 CCP meetings, many of which focused on process improvements. The progress made by the participants has been significant. Among other things, the CCP has adopted the CLEC definition of "CLEC-Affecting Change" to govern the scope of the CCP; BellSouth has agreed to provide change request capacity information; BellSouth has agreed to enlarge the scope of the CCP to include "development" of new interfaces as opposed to just "implementation" of new interfaces; BellSouth has agreed to

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enlarge the scope of the CCP to include documentation changes; and BellSouth has agreed to lengthen the notification period for retirement of interfaces from 120 to 180 days. The collaboration on possible process improvements continues today. Since the beginning of June alone, BellSouth and the CLECs have met on multiple different occasions to discuss additional process improvements including initial requirements for a new CLEC testing website; corrections of defects found in "frozen" maps of interfaces; and BellSouth's proposal to allow CLECs to participate in a "go/no go" decision on software releases.

While all aspects of the change control process have been open for discussion, BellSouth has continued specifically to collaborate with CLECs to increase the transparency of the internal prioritization process. *See Georgia/Louisiana Order* ¶ 185. To that end, BellSouth has agreed to provide to the CLECs information on BellSouth's Legacy System releases via the CCP website and all BellSouth maintenance release information via the CCP Change Control Release Schedule. In addition, BellSouth now posts all Type 2 through Type 6 change requests to the Flagship Feature Release Schedule for the CLECs' use. Moreover, BellSouth now brings representatives from the Local Carrier Service Center (LCSC) and its Information Technology group to the CCP meetings, and has committed to bring subject matter experts as required. Finally, BellSouth now provides the CCP with a tracking report in which the status of all change requests is summarized.

In addition, BellSouth has followed through on its commitment to implement a fourth level of escalation in the dispute resolution procedure. *See Georgia/Louisiana Order* ¶ 186, n.699. Specifically, in Ballot #13, BellSouth asked the CLECs to vote to change the escalation process to start with a higher management level (Operations – Assistant Vice President) and end with a higher management level (Network – Vice President). On the ballot, the CLECs unanimously agreed to this change and BellSouth updated the CLEC website with this information on July 29, 2002.

CLEC Application Verification Environment ("CAVE") Is Available

With respect to testing, BellSouth continues to improve its CAVE test environment. *See Georgia/Louisiana Order*, ¶ 190. CAVE has been available to CLECs for most of 2002. CAVE was available for pre-soak testing for Release 10.5 from May 6 - June 1 (immediately prior to the release). For Release 10.6, pre-soak testing began on July 26 and continued through August 23. In addition, CAVE will be available for post-release testing from August 23 through November 8. Pre-soak testing for Release 11.0 is scheduled to start in CAVE on November 11 and run through December 6. Thus, BellSouth is providing CCP members with ample testing opportunities. In addition, BellSouth is working with the CLECs to improve the CAVE testing process. Some of the improvements the CCP has discussed include: the establishment of a testing profile; the elimination of the requirement for a formal test agreement; implementation of regression

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testing; and the implementation of a more defined defect management process. Moreover, as a result of CLEC input, BellSouth agreed to draft change requests to allow CLECs to test in CAVE using their own data and to enhance CAVE to allow CLECs to test multiple versions of CAVE. Finally, with Release 10.6, BellSouth implemented a pre-release testing status report identifying unresolved defects. BellSouth updated this report on a daily basis through production implementation of the release. This report provided CLECs with information on defects/issues in the release. Coupled with that report, BellSouth conducted weekly conference calls during pre-release CAVE testing to provide the opportunity for comment and the exchange of information related to the testing.

Other Software Testing Improvements Are Being Implemented

Finally, BellSouth continues to implement improvements to its software testing and implementation to reduce defects to a minimum, including "consider[ing] any input from competitive LECs regarding software problems they discover during testing before BellSouth decides to implement a new software release." *See Georgia/Louisiana Order ¶¶ 181, 195.* By all external standards, Release 10.5 was a success. The QP Management Group, in a study conducted for BellSouth, concluded that BellSouth's software is comparable to the industry "best in class" in terms of defects per function point. Moreover, while there were defects, the defects were either minor or, if not minor, were fixed quickly.

That being said, BellSouth is continuing to look for ways to improve the quality of its software releases. To that end, BellSouth modified its implementation of Release 10.6 to "push" existing LSRs through the systems before installing the new software to avoid, to the extent possible, the defects that appear as a result of LSRs in progress in the old software. In addition, BellSouth hired a third party vendor to expand BellSouth's internal test deck cases used by BellSouth during internal release testing to try to capture as wide a variety of possible defects as is practicable. This expanded test deck will be available for CLECs to use in CAVE as well. These efforts appeared to have paid off. Two days after implementation of Release 10.6, BellSouth was aware of only 5 defects, 4 of which were Severity 3, and which affected only a sub-set of UCL-ND orders. Moreover, the Florida Commission ordered new defect timeframes that BellSouth has implemented - 10 business days for high impact; 30 business days for medium impact; and 45 business days for low impact. Last, BellSouth has proposed to the CCP that CLECs that have tested in CAVE participate in a go/no go decision in which they would either recommend that a particular release go forward as scheduled, or that BellSouth defer implementation to a later date (based on two established criteria namely an unresolved validated severity level 1 defect, or an unresolved validated severity level 2 defect with no workaround). Under BellSouth's proposal, the vote would take place one week before the scheduled implementation date of the release. BellSouth would then use

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this recommendation, in conjunction with the recommendations of its quality assurance testing teams and its testing information, to make a final decision on implementation of the release. This proposal is still under consideration by the CCP.

Conclusion

In conclusion, the FCC found BellSouth's CCP compliant with Section 271 in its *Georgia/Louisiana Order*. Further, the CCP process has evolved since the Commission approved BellSouth 271 application in November 2001. First, the 50/50 plan will allocate one-half of BellSouth's IT release capacity to the CLEC community for the implementation of CLEC desired changes. Further, BellSouth has implemented six new CCP measures, three of which have penalties associated with them. This now provides eleven measures and five Tier 2 penalties for this Commission's use in reviewing BellSouth's compliance with the CCP and with its responsiveness to CLEC-initiated change requests. Additionally, BellSouth has held 84 CCP meetings with CLECs since November 6, 2001. These new measures and actions meet, and arguably exceed, the scope of the Commission's Order. Thus, BellSouth respectfully submits this proposal for approval pursuant to the Commission's Order No. 2002-77.

Sincerely,



Caroline N. Watson

CNW/nml
Enclosure
PC Docs # 460322

Exhibit A



Change Management

CM-6: Percent of Software Errors Corrected in X (10, 30, 45) Business Days

Definition

Measures the percent of Software Errors corrected by BellSouth in X (10, 30, 45) business days within the report period.

Exclusions

- Software Corrections having implementation intervals that are longer than those defined in this measure and agreed upon by the CLECs.
- Rejected or reclassified software error. (BellSouth must report the number of rejected or reclassified software errors disputed by the CLECs.)

Business Rules

This metric is designed to measure BellSouth's performance in correcting identified Software Errors within the specified interval. The clock starts when a Software Error is validated per the Change Control Process, a copy of which can be found at http://www.interconnection.bellsouth.com/markets/lsc/esp_live/index.html, and stops when the error is corrected and notice is posted to the Change Control Website. Software defects are defined as Type 6 Change Requests in the Change Control Process.

Calculation

Percent of software Errors Corrected in X (10, 30, 45) Business Days = $(a / b) \times 100$

- a = Total number of Software Errors corrected where "X" = 10, 30, or 45 business days.
- b = Total number of Software Errors requiring correction where "X" = 10, 30, or 45 business days.

Report Structure

- Severity 2 = 10 Business Days
- Severity 3 = 30 Business Days
- Severity 4 = 45 Business Days

Data Retained

- Report Period
- Total Completed
- Total Completed Within X Business Days
- Disputed, Rejected or Reclassified Software Errors

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• 95% within interval

SEEM Measure

SEEM Measure		
Yes	Tier I Tier II	Yes

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	• 95% within interval



South Carolina Performance Metrics

Change Management

CM-7: Percent of Change Requests Accepted or Rejected Within 10 days

Definition

Measures the percent of Change Requests other than Type 1 or Type 6 Change Requests, submitted by CLECs that are Accepted or Rejected by BellSouth in 10 business days within the report period.

Exclusions

- Change Requests that are canceled or withdrawn before a response from BellSouth is due.

Business Rules

The Acceptance/Rejection interval starts when the acknowledgement is due to the CLEC per the Change Control Process, a copy of which can be found at http://www.interconnection.bellsouth.com/markets/sc/eco_live/index.html. The clock ends when BellSouth issues an acceptance or rejection notice to the CLEC. This metric includes all change requests not subject to the above exclusions, not just those received and accepted or rejected in the same reporting period.

Calculation

Percent of Change Requests Accepted or Rejected within 10 Business Days = $(a / b) \times 100$

- a = Total number of Change Requests accepted or rejected within 10 business days.
- b = Total number of Change Requests submitted in the reporting period.

Report Structure

- BellSouth Aggregate

Data Retained

- Report Period
- Requests Accepted or Rejected
- Total Requests

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• 95% within interval

SEEM Measure

SEEM Measure		
	Tier I	
Yes	Tier II	Yes

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	• 95% within interval



Change Management

CM-8: Percent Change Requests Rejected**Definition**

Measures the percent of Change Requests other than (Type I or Type 6 Change Requests) submitted by CLECs that are rejected by reason within the report period.

Exclusions

- Change Requests that are cancelled or withdrawn by CLEC before a response from BellSouth is due.

Business Rules

This metric includes any rejected change requests in the reporting period, regardless of whether received early or late. The metric will be disaggregated by major categories of rejections per the Change Control Process, a copy of which can be found at http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html. These reasons are: Cost, Technical Feasibility, and Industry Direction. This metric includes all change requests not subject to the above exclusions, not just those received and accepted or rejected in the same reporting period.

Calculation

Percent Change Requests Rejected = $(a / b) \times 100$

- a = Total number of Change Requests rejected.
- b = Total number of Change Requests submitted within the report period.

Report Structure

- BellSouth Aggregate
- Cost
- Technical Feasibility
- Industry Direction

Data Retained

- Report Period
- Requests Rejected
- Total Requests

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
<ul style="list-style-type: none"> • Region • Reason - Cost • Reason - Technical Feasibility • Reason - Industry Direction 	<ul style="list-style-type: none"> • Diagnostic

SEEM Measure

SEEM Measure					
No	<table border="1"> <tr> <td>Tier I</td><td></td></tr> <tr> <td>Tier II</td><td></td></tr> </table>	Tier I		Tier II	
Tier I					
Tier II					

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable



Change Management

CM-9: Number of Defects in Production Releases (Type 6 CR)**Definition**

Measures the number of defects in Production Releases. This measure will be presented as the number of Type 6 Severity 1 defects, the number of Type 6 Severity 2 defects without a mechanized work around, and the number of Type 6 Severity 3 defects resulting within a three week period from a Production Release date. The definition of Type 6 Change Requests (CR) and Severity 1, Severity 2, and Severity 3 defects can be found in the Change Control Process Document.

Exclusions

None.

Business Rules

This metric measures the number of Type 6 Severity 1 defects, the number of Type 6 Severity 2 defects without a mechanized work around, and the number of Type 6 Severity 3 defects resulting within a three week period from a Production Release date. The definitions of Type 6 Change Requests (CR) and Severity 1, 2, and 3 defects can be found in the Change Control Process, which can be found at http://www.interconnection.bellsouth.com/markers/icc/ccp_live/index.html.

Calculation

- The number of Type 6 Severity 1 Defects, the number of Type 6 Severity 2 Defects without a mechanized work around, and the number of Type 6 Severity 3 defects.

Report Structure

- Production Releases
- Number of Type 6 Severity 1 defects
- Number of Type 6 Severity 2 defects without a mechanized work around
- Number of Type 6 Severity 3 defects

Data Retained

- Region
- Report Period
- Production Releases
- Number of Type 6 Severity 1 defects
- Number of Type 6 Severity 2 defects without a mechanized work around
- Number of Type 6 Severity 3 defects

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region—Number of Type 6 Severity 1 defects	• 0 Defects
• Region—Number of Type 6 Severity 2 defects without a mechanized work around	• 0 Defects
• Region—Number of Type 6 Severity 3 defects	• 0 Defects

SEEM Measure

SEEM Measure	
No	Tier I Tier II

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable



Change Management

CM-10: Software Validation

Definition

Measures software validation test results for Production Releases of BellSouth Local Interfaces.

Exclusions

- None

Business Rules

BellSouth maintains a test deck of transactions that are used to validate that functionality in software Production Releases work as designed. Each transaction in the test deck is assigned a weight factor, which is based on the weights that have been assigned to the metrics. Within the software validation metric weight factors will be allocated among transaction types (e.g., Pre-Order, Order Resale, Order UNE, Order UNE-P) and then equally distributed across transactions within the specific type.

BellSouth will begin to execute the software validation test deck within one (1) business day following a Production Release. Test deck transactions will be executed using Production Release software in the CAVE environment. Within seven (7) business days following completion of the Production Release software validation test in CAVE, BellSouth will report the number of test deck transactions that failed. Each failed transaction will be multiplied by the transaction's weight factor.

A transaction is considered failed if the request cannot be submitted or processed, or the results in incorrect or improperly formatted data.

Calculation

This software validation metric is defined as the ratio of the sum of the weights of failed transactions using Production Release software in CAVE to the sum of the weights of all transaction in the test deck.

- Numerator = Sum of weights of failed transactions
- Denominator = Sum of weights of all transactions in the test deck

Report Structure

- BellSouth Aggregate

Data Retained

- Report Period
- Production Release Number
- Test Deck Weights
- % Test Deck Weight Failure

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• <= 5%

SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	• Not Applicable



Change Management

CM-11: Percent of Change Requests Implemented Within 60 weeks of Prioritization

Definition

Measures whether BellSouth provides CLECs timely implementation of prioritized change requests.

Exclusions

- Change requests that are implemented later than 60 weeks with the consent of the CLECs.
- Change requests for which BellSouth has regulatory authority to exceed the interval

Business Rules

This metric is designed to measure BellSouth's performance in implementing prioritized change requests. The clock starts when a change request has been prioritized as described in the Change Control Process. The clock stops when the change request has been implemented by BellSouth and made available to the CLECs. BellSouth will begin reporting this measure with the next release for diagnostic purposes, and will be measured for SEEM purposes 60 weeks from first prioritization meeting following Commission approval of this measure.

Calculation

Percent of Type 5 CLEC initiated Change Requests implemented on time = $(a / b) \times 100$

- a = Total number of prioritized Type 5 CLEC initiated Change Requests that are less than or equal to 60 weeks of age from the date of the release prioritization list
- b = Total number of prioritized Type 5 CLEC initiated Change Requests from the date of the release prioritization list

Percent of Type 4 BellSouth initiated Change Requests implemented on time = $(a / b) \times 100$

- a = Total number of prioritized Type 4 BellSouth initiated Change Requests that are less than or equal to 60 weeks of age from the date of the release prioritization list
- b = Total number of prioritized Type 4 BellSouth initiated Change Requests from the date of the release prioritization list

Report Structure

- BellSouth Aggregate
- Type 4 requests implemented
- Type 5 requests implemented
- % implemented within 16, 32, 48, and 60 weeks

Data Retained

- Region
- Report Month
- Total implemented by type
- Total implemented within 60 weeks

SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• 95% within interval
• Type 4 requests implemented	• 95% within interval
• Type 5 requests implemented	• 95% within interval



South Carolina Performance Metrics

Change Management

SEEM Measure

SEEM Measure		
	Tier I	
Yes	Tier II	Yes

SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation		SEEM Analog/Benchmark	
• Region		• 95% within interval	



South Carolina IPP

IPP Submetrics

2. Tier 2 Submetrics

Table B-2 contains a list of Tier 2 submetrics.

Table B-2: Tier 2 Submetrics

Item No.	Tier 2 Sub Metrics
1	Average Response Time - Pre-Ordering/Ordering
2	Interface Availability - Pre-Ordering/Ordering
3	Interface Availability - Maintenance & Repair
4	Loop Makeup - Response Time - Manual
5	Loop Makeup - Response Time - Electronic
6	Acknowledgement Message Timeliness - EDI
7	Acknowledgement Message Timeliness - TAG
8	Acknowledgement Message Completeness EDI
9	Acknowledgement Message Completeness TAG
10	Percent Flow-through Service Requests (Summary)
11	Reject Interval
12	Firm Order Confirmation Timeliness
13	Firm Order Confirmation and Reject Response Completeness - Fully Mechanized
14	Percent Missed Installation Appointments - Resale POTS
15	Percent Missed Installation Appointments - Resale Design
16	Percent Missed Installation Appointments - UNE Loop and Port Combinations
17	Percent Missed Installation Appointments - UNE Loops
18	Percent Missed Installation Appointments - UNE xDSL
19	Percent Missed Installation Appointments - UNE Line Sharing
20	Percent Missed Installation Appointments - Local IC Trunks
21	Average Completion Interval - Resale POTS
22	Average Completion Interval - Resale Design
23	Average Completion Interval - UNE Loop and Port Combinations
24	Average Completion Interval - UNE Loops
25	Average Completion Interval - UNE xDSL
26	Average Completion Interval - UNE Line Sharing
27	Average Completion Interval - Local IC Trunks
28	Coordinated Customer Conversions Interval - Unbundled Loops
29	Coordinated Customer Conversions - Hot Cut Timeliness Percent within interval - UNE Loops
30	Coordinated Customer Conversions - Percent Provisioning Troubles Received within 7 days of a completed service order - UNE Loops
31	Cooperative Acceptance Testing - Percent UNE xDSL Loops Tested
32	Percent Provisioning Troubles within 30 days of Service Order Completion - Resale POTS
33	Percent Provisioning Troubles within 30 days of Service Order Completion - Resale Design



South Carolina IPP

IPP Submetrics

Table B-2: Tier 2 Submetrics (Continued)

Item No.	Tier 2 Sub Metrics
34	Percent Provisioning Troubles within 30 days of Service Order Completion - UNE Loop and Port Combinations
35	Percent Provisioning Troubles within 30 days of Service Order Completion - UNE Loops
36	Percent Provisioning Troubles within 30 days of Service Order Completion - UNE xDSL
37	Provisioning Troubles within 30 days of Service Order Completion - UNE Line Sharing
38	Percent Provisioning Troubles within 30 days of Service Order Completion - Local IC Trunks
39	LNP - Percent Missed Installation Appointments
40	Missed Repair Appointments - Resale POTS
41	Missed Repair Appointments - Resale Design
42	Missed Repair Appointments - UNE Loop and Port Combinations
43	Missed Repair Appointments - UNE Loops
44	Missed Repair Appointments - UNE xDSL
45	Missed Repair Appointments - UNE Line Sharing
46	Missed Repair Appointments - Local IC Trunks
47	Customer Trouble Report Rate - Resale POTS
48	Customer Trouble Report Rate - Resale Design
49	Customer Trouble Report Rate - UNE Loop and Port Combinations
50	Customer Trouble Report Rate - UNE Loops
51	Customer Trouble Report Rate - UNE xDSL
52	Customer Trouble Report Rate - UNE Line Sharing
53	Customer Trouble Report Rate - Local IC Trunks
54	Maintenance Average Duration - Resale POTS
55	Maintenance Average Duration - Resale Design
56	Maintenance Average Duration - UNE Loop and Port Combinations
57	Maintenance Average Duration - UNE Loops
58	Maintenance Average Duration - UNE xDSL
59	Maintenance Average Duration - UNE Line Sharing
60	Maintenance Average Duration - Local IC Trunks
61	Percent Repeat Troubles within 30 days - Resale POTS
62	Percent Repeat Troubles within 30 days - Resale Design
63	Percent Repeat Troubles within 30 days - UNE Loop and Port Combinations
64	Percent Repeat Troubles within 30 days - UNE Loops
65	Percent Repeat Troubles within 30 days - UNE xDSL
66	Percent Repeat Troubles within 30 days - UNE Line Sharing
67	Percent Repeat Troubles within 30 days - Local IC Trunks
68	Invoice Accuracy
69	Mean Time to Deliver Invoices
70	Usage Data Delivery Accuracy



South Carolina IPP

IPP Submetrics

Table B-2: Tier 2 Submetrics (Continued)

Item No.	Tier 2 Sub Metrics
71	Trunk Group Performance - Aggregate
72	Collocation Percent of Due Dates Missed
73	Timeliness of Change Management Notices
74	Timeliness of Documents Associated with Change
75	Percent of Software Errors Corrected in X (10, 30, 45) Business Days
76	Percent of Change Requests Accepted or Rejected Within 10 Days
77	Percent of Change Requests Implemented Within 60 Weeks of Prioritization
78	Service Order Accuracy - Resale Residence
79	Service Order Accuracy - Resale Business
80	Service Order Accuracy - Resale Design (Specials)
81	Service Order Accuracy - UNE Specials (Design)
82	Service Order Accuracy - UNE (Non-Design)
83	Service Order Accuracy - Local Interconnection Trunks

Exhibit B

CM-1: Timeliness of Change Management Notices

•Measures whether CLECs receive required software release notices on time to prepare for BellSouth interface/system changes so CLEC interfaces are not impaired by change.

CM-2: Change Management Notice Average Delay Days

•Measures the average delay days for change management system release notices sent outside the time frame set forth in the Change Control Process.

CM-3: Timeliness of Documents Associated with Change

•Measures whether CLECs received requirements or business rule documentation on time to prepare for BellSouth interface/system changes so CLEC interfaces are not impaired by change.

CM-4: Change Management Documentation Average Delay Days

•Measures the average delay days for requirements or business rule documentation sent outside the time frames set forth in the Change Control Process.

CM-5: Notification of CLEC Interface Outages

•Measures the time it takes BellSouth to notify the CLEC of an outage of an interface.

CM-6: Percent of Software Errors Corrected in X (10, 30, 45) Business Days

•Measures the percent of Software Errors corrected by BellSouth in X (10, 30,45) business days within the report period.

CM-7: Percent of Change Requests Accepted or Rejected Within 10 days

•Measures the percent of Change Requests other than Type 1 or Type 6 Change Requests, submitted by CLECs that are Accepted or Rejected by BellSouth in 10 business days within the report period.

CM-8: Percent Change Requests Rejected

•Measures the percent of Change Requests other than Type 1 or Type 6 Change Requests submitted by CLECs that are rejected by reason within the report period.

CM-9: Number of Defects in Production Releases (Type 6 CR)

•Measures the number of defects in Production Releases.

This measure will be presented as the number of Type 6 Severity 1 defects, the number of Type 6 Severity 2 defects without a mechanized work around, and the number of Type 6 Severity 3 defects resulting within a three week period from a Production Release date. The definition of Type 6 Change Requests (CR) and Severity 1, Severity 2, and Severity 3 defects can be found in the Change Control Process Document.

CM-10: Software Validation

•Measures software validation test results for Production Releases of BellSouth Local Interfaces.

CM-11: Percent of Change Requests Implemented Within 60 weeks of Prioritization

•Measures whether BellSouth provides CLECs timely implementation of prioritized change requests.